Township of Logan

125 Main Street P.O. Box 314 Bridgeport, NJ 08014-0314



Frank W. Minor Mayor

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October 12, 2007

Office of Smart Growth NJ Department of Community Affairs 101 South Broad Street P.O. Box 204 Trenton, NJ 08625-0204

Attn: Ben Spinelli, Acting Executive Director

Re: Initial Plan Endorsement Petition- Logan Township

Completeness Determination Response

2001 OCT 12 P 3: 04

ECOMMUNITY AFFAIRS
OFFICE OF SMART GROWTH

Dear Mr. Spinelli:

We have reviewed your completeness determination letter dated July 17, 2007 and have outlined this response letter to address each item from your letter. We have copied your comments and provided a response to each below. We hope that after reviewing the revisions and additions you will deem our petition complete.

Additional Information Required for Completeness:

Master Plan and Available Sub-Elements

The Logan Township Master Plan Re-Examination Report, 2001 was not included digitally as indicated in the list of documents for the petition. Please provide a digital copy or nine (9) additional color copies for distribution to our respective state agency partners as required in the Plan Endorsement Guidelines. Also, please clarify if the Logan Township Master Plan, December 2000, which we received one color copy of during Pre-Petition, is the 2001 Re-Examination Report. If they are not the same document, we require a digital copy or nine (9) additional color copies of the December 2000 Master Plan as well.

Response: The pre-petition meeting item named, The Logan Township Master Plan from December 2000 was the item which should have been submitted. A 2001 Master Plan re-examination was never completed. Accompanying this re-submission you will find a color digital copy of the Logan Township Master Plan from December 2000, as well as an augmented Petition which addresses the discrepancy.

Community Vision Statement

The petition narrative indicates Logan Township has not formally entered into the "Visioning Process" and includes a description of goals and objectives from the 2005 Master Plan Reexamination Report in lieu of a formal Visioning Statement. This does not constitute a vision statement. As described in the Plan Endorsement Guidelines (pages 11-12), a vision statement should be created through a public process and should describe the desired future of the municipality in 20 years as it relates to land development, redevelopment, preservation and conservation of resources, transportation, economic growth, housing diversity and affordability, the provision of public facilities and intergovernmental coordination. The Vision Statement should also include a community vision for the three proposed centers; Repaupo Village Center, the Town Center River District and the Bridgeport Town Center.

Response: Several public sessions were held in January and February of 2006. In those public meetings we worked with many citizens from the Township to formulate a Vision for the future of the Township of Logan. The consensus stemming from these meetings led to a vision of the Township which has subsequently been put fourth in the Petition. The Plan Endorsement process was presented to the public and the public's concerns, desires, and Vision for the future of the Township were compared to goals and objectives from the 2005 Master Plan Re-examination. The basis of the Visioning for the future of the Township is consistent with the Master Plan and has been presented as such in the Plan Endorsement Petition. We have augmented the Plan Endorsement Petition to include an outline and summary of these meetings and have included as part of this package the minutes from these meetings. It is also important to note that this Plan Endorsement petition resulted from two Mount Laurel law suits against the Township. The court imposed the basic design as well as the time frame to submit the Petition. All of these documents were submitted with the Initial Petition submitted on June 21, 2007.

Justification for State Plan Policy Map Amendments

While there is a general statement describing how the amendment promotes local, Regional, and State Goals and objectives and impacts public sector decisions and the reason(s) why the amendment cannot await the next revisions of the State Plan; the statement does not look at each proposed planning area and center designation individually. Sufficient justification should be provided as described in Appendix 6.2 of the Plan Endorsement Guidelines (pages 41 and 42). Similarly, there should be a report describing consistency and impact of proposed planning area changes and center designations on adjoining municipalities, counties, or regional agencies as described in Appendix 6.2 of the Plan Endorsement Guidelines (pages 41 and 42). While the petition includes statements on how the proposed centers meet the delineation criteria outlined in the State Plan; some of the specific delineation criteria is not addressed. Each center justification should include all of the delineation criteria. In addition, these statements should describe how the proposed centers will accommodate local and regional population, household and employment growth targets. For example, both the proposed Repaupo Village Center and River District Village Center will include over 2,800 new residential units, more than doubling the existing housing stock. The petition should describe the needed infrastructure and community facilities to accommodate this proposed growth. Moreover, this statement should describe how the proposed amendments are consistent with any adjoining municipal plans or how these mapping changes will impact those municipalities.

Response: As stipulated in the submitted Settlement Agreements between Logan Township and Raccoon Creek LLC, and Logan Township and The Villages at Logan LLC., the Township's basic design and parameters for the submittal is based on a court-ordered time frame. Except for the proposed change from PA-3 to PA-4 within the R-5 Zoning District and the request for the Bridgeport Town Center designation, the requested changes are necessitated by the court mandate. We have amended the Plan Endorsement to include the additional information to the extent possible under Appendix 6.2 of the Plan endorsement Guidelines.

Statement of Planning Coordination

While the petition includes a Statement of Planning Coordination, this statement is missing the following element that is identified as a requirement in the Plan Endorsement Guidelines. If applicable, the Township must include the following:

 A statement detailing any ongoing local or regional planning or development activities by any level of government and the level of development activity by the private sector.

While the other components of a Statement of Planning Coordination are included; the petition responses do not adequately address all of the requirements, such as a description of outreach to other municipalities. For example, the description of outreach efforts should include the municipalities who border the three centers proposed for designation or an explanation of why no such efforts were undertaken.

Response: Recently we were in attendance at a meeting held by the DVRPC and the NJDOT in which we were able to explain our proposal and coordinate our efforts with Woolwich Township, Harrison Township, Gloucester County, the DVRPC, and the NJDOT. The meeting allowed us to verify that our planning efforts for the Bridgeport Town Center in Logan Township match almost identically to the 2007 plan put fourth by the DVRPC and the DOT. It was also verified in that meeting, that the adjacent municipalities such as Woolwich Township have taken similar steps and planning efforts that correspond with Logan Township's. Since our plans for the future of the Township coincide almost seamlessly with that of the regional MPO, State agencies and, adjacent municipalities we have augmented the Plan Endorsement Petition to indicate our compliance with the require elements for Planning coordination.

Present and Future Population, Households and Employment Projections

Projections of population, household and employments growth are an essential guide for the development of the municipality and county. Municipal growth targets should be aligned with county or regional growth targets, whether or not the municipality is participating in a county or regional strategic plan. If the municipal growth targets are not aligned, a detailed justification for the reasons of the disagreement should be included. While the petition acknowledges the MPO growth targets are considerably low in light of the three proposed centers; the Township does not provide their own growth targets or justification for the disagreements with the MPO projections.

Response: As stipulated in the submitted Settlement Agreements between Logan Township and Raccoon Creek LLC, and Logan Township and The Villages at Logan LLC.; the Township's basic design for the submittal is court ordered. The estimates were based off of the MPO estimates as well as the estimates increases that will result from the two court mandated proposed village centers. The justification for the discrepancy can be found in the previously submitted Settlement Agreements as well as the Judgment of Repose.

Existing Land Use Inventory and/or Zoning Maps

The petition indicates 10 copies of a community facilities map was submitted with the petition, but the petition did not include these maps. Please submit a community facilities map providing information concerning the location of community facilities and services, e.g. municipal and county buildings, community colleges, schools, libraries, police and fire protection. Please also include a statement of facility capacity where applicable. While the petition includes descriptions of the Township's existing and proposed affordable housing locations, please indicate these locations on a map. These locations could be added to the existing Logan Township Plan Endorsement map depicting proposed planning area and center boundaries.

Response: The Petition does not indicate that there is a map associated with the submitted Community Facilities Plan. There is no map for the plan nor do we indicate that there is a Community Facilities map anywhere in the Petition or in the list of document submitted. This map was never completed by the Township, though one may be prepared in the future. The proposed locations of the affordable housing and proposed planning areas are clearly indicated on the Plan Endorsement Map and the individual Conceptual Maps all of which where submitted previously. Since most of these projects are dependent on Plan Endorsement by the State Planning Commission we can not provide any further information than that which was submitted. An updated Zoning Map is being submitted digitally with this re-submission.

Additional Municipal Petition Requirements

The petition states a copy of Logan Township's Municipal Environmental Justice Inventory was submitted with the petition, but the petition did not include this document.

Response: We have included the Environmental Justice Inventory as well as the Gloucester County Brownfield Sites information for the Township as a part of this resubmittal.

Proof of Notice Requirements

The Township must provide minutes for all of the public meetings regarding their petition for Initial Plan Endorsement, specifically the Council meeting where the petition was endorsed. As discussed in the Plan Endorsement Guidelines (page 44), the Township must include copies of the minutes of each public meeting during which the Plan Endorsement petition was reviewed and of the meeting at which the resolution endorsing the petition was approved. Minutes shall include a summary of public comments and copies of written comments filed before, or presented at the public meeting.

Response: We have included the minutes for all the public meetings which address the Plan endorsement and the Housing Plan as well as the adopting resolutions and the minutes from the associated meetings.

Please feel free to contact me if you have any questions or are in need of additional information. We look forward to your response.

/e̞ry truly yours,

Mayor Frank W. Minor

Logan Township

Enc: One digital copy of all items listed on the Document List

CC:(all will have one copy of Petition for Initial Plan Endorsement enclosed)

Robert Becker, Esq.

Linda Oswald, Logan Township Clerk

Dale Taylor, Esq.

Marc Shuster, PP, AICP

Ryan Conklin

Melanie Adamson, PE, CME

Elizabeth McKenzie, PP

David Kinsey PhD, FAICP, PP

Mark Bergman

Carl Bisgaier, Esq.

David Mieskin

Jeffrey Kantowitz Esq.

Creigh Rahenkamp, AICP, PP

Charles E. Romick, ACIP, PP, Gloucester County